Jennifer M. Gaddis, OSB No. 071194
jgaddis@cityofsalem.net
City of Salem, Legal Department
555 Liberty St. SE, Room 205
Salem, Oregon 97301
Telephone: (503) 588-6003
Facsimile: (503) 361-2202
        Attorney for Defendant City of Salem

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

KEVIN BRATCHER,
 	
    Plaintiff,
 	
    v.
 	
POLK COUNTY, CITY OF SALEM, DEPUTY MICHAEL H. SMITH, in his individual capacity, and DOES 1-4, in their individual capacity,
 	
    Defendants.
	Case No. 3:20-CV-02056-SB
	
	DECLARATION OF JENNIFER M. GADDIS IN SUPPORT OF CITY OF SALEM'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER A COMPLAINT

I, Jennifer M. Gaddis, under penalty of perjury, declare as follows:

1.   I am the attorney of record for the City of Salem in this matter and have personal knowledge of the facts within this declaration and am competent to testify.

2.   The City of Salem was served with the Summons and Complaint on or about December 14, 2020.

3.   The City of Salem moves for an extension of time to file its responsive pleading so that the parties can further their discussions about the substantive issues in the case. Therefore, I request until February 3, 2021 to file its responsive pleading.

4.   The responsive pleading deadline for Polk County and Polk County Deputy Michael Smith is on or about February 2, 2021.

5.   Neither of the other parties in this matter oppose the City's motion.

6.   This motion is not made for purpose of delay.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

DATED: January 4, 2021.

s/ Jennifer M. Gaddis
Jennifer M. Gaddis, OSB 071194
jgaddis@cityofsalem.net
Attorney for Defendant City of Salem

CITY OF SALEM
LEGAL DEPARTMENT
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SALEM, OR 97301
PHONE: 503-588-6003